



STATE ETHICS COMMISSION

ROGER RAEL,
Complainant,
v.
STEFANI LORD,
Respondent.

No. 2023-25

**ORDER APPROVING SETTLEMENT AGREEMENT AND DISMISSING
COMPLAINT**

On February 2, 2024, at an open meeting, the Commission voted to approve the attached settlement agreement with respondent, resolving the claims in this matter. Pursuant to that agreement, the complaint against respondent is hereby DISMISSED. Pursuant to NMSA 1978, Section 10-16G-10(F) (2021), the complaint and the settlement agreement are subject to public disclosure.

SO ISSUED, this 2nd day of February 2024.

**HON. WILLIAM F. LANG, Chair
JEFFREY L. BAKER, Commissioner
STUART M. BLUESTONE, Commissioner
HON. CELIA CASTILLO, Commissioner
HON. DR. TERRY MCMILLAN, Commissioner
RONALD SOLIMON, Commissioner
JUDY VILLANUEVA, Commissioner**



STATE ETHICS COMMISSION

Walker Boyd, General Counsel
800 Bradbury Drive Southeast, Suite 215
Albuquerque, NM 87106
505.554.7196 | walker.boyd@sec.nm.gov

Hon. William F. Lang (Chair)
Jeffrey L. Baker
Stuart M. Bluestone
Hon. Celia Castillo
Hon. Dr. Terry McMillan
Ronald Solimon
Dr. Judy Villanueva

Jeremy D. Farris, Executive Director

October 30, 2023

Representative Stefani Lord
Post Office Box 131
Sandia Park, NM 87047

via email only: info@lord2020.com

Re: *Rael v. Lord*, No. 2023-25

Dear Representative Lord:

Thank you for your October 9, 2023 response to my request for information dated September 15, 2023. Your correspondence is sufficient to show that all but one category of the expenditures identified in my request for information were indeed “expenditures of the campaign,” and therefore did not violate the Campaign Reporting Act. *See* NMSA 1978, § 1-19-29.1(A)(1) (2009).

The one category of expenditure that is not permitted under the Campaign Reporting Act is the set of expenditures you made for legislative-session living expenses. Specifically, your 2022 Fourth General report of contributions states that you caused your campaign to spend \$4,310.00 to pay for a short-term rental house for use during the session. That report also discloses \$874.59 in expenditures to Amazon.com, some of which appear to have been for clothing that you wore for use during the legislative session.

While a candidate may make expenditures of campaign funds on “expenditures of legislators that are reasonably related to performing the duties of the office held, including mail, telephone and travel expenditures to serve constituents,” the Campaign Reporting Act expressly prohibits such expenditures on “personal and legislative session living expenses[.]” *See* NMSA 1978, § 1-19-29.1(A)(2) (2009). Accordingly, your expenditure of campaign funds on a short-term rental and clothing for use during the legislative session violated Section 1-19-29.1(A)(2) of the Campaign Reporting Act.¹ While I appreciate that you reimbursed your campaign for most (if not all) of these expenditures after the session, the underlying expenditures should not have been made using campaign funds in the first instance.

Nonetheless, because you made efforts to reimburse your campaign for these impermissible expenditures before the complaint in this matter was filed, and appear to have admitted that you caused your campaign to make impermissible expenditures, I believe that a settlement of this matter is in the best interest of the Commission, and that the settlement should be for an amount lower than the \$1,000 per-violation civil penalty available under the Campaign Reporting Act. *See* NMSA 1978, § 1-19-34.6(C) (2021). Accordingly, pursuant to Rule 11-408

¹ Although you state that your clothing purchases in December 2022 were for “fundraisers or other campaign-related events,” the Campaign Reporting Act prohibits fundraising activity during the legislative session. *See* NMSA 1978, § 1-19-34.1(A) (2019).

State Ethics Commission

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October 30, 2023

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NMRA (incorporated and applicable to State Ethics Commission proceedings under NMSA 1978, Section 10-16G-12(C) (2019)), I offer to settle this matter on the following terms:

1. Within 14 days of a Commission vote to approve this agreement, you pay a \$500 civil penalty to the State of New Mexico for a single violation of NMSA 1978, § 1-19-29.1(A)(2) (2009). Please note that this civil penalty may be paid using campaign funds. *See* 1.10.13.25(B)(4) NMAC.

If you accept the terms of this settlement offer, please sign a copy of this letter and return it to me. If the Commission approves this settlement agreement and you comply with your obligations under the agreement, the Commission will enter an order dismissing the complaint. Please note that if you accept this settlement agreement and the Commission approves it, the complaint and this settlement agreement would become public records. *See* NMSA 1978, §§ 10-16G-10(F), 10-16G-12(F) (2019).

Please confirm whether this offer of settlement is acceptable on or before November 10, 2023.

Very truly yours,



Walker Boyd

I ACCEPT:

Stefani Lord

Dated:

From: [Stefani Lord](#)
To: [Boyd, Walker, SEC](#)
Subject: Re: [EXTERNAL] Rael V. Lord
Date: Friday, November 24, 2023 3:41:12 PM
Attachments: [State_Ethics2.pdf](#)
[StateEthics1.pdf](#)

As a new legislator, senior legislators misguidedly advised me that I could "borrow money for a casita from the campaign as long as I pay it back." And that "this is something everyone does." As you can see from my campaign filing and documentation, I followed this advice, borrowed the money for a legislative rental in Santa Fe, and reimbursed the campaign as noted by the New Mexico State Ethics Commission letter. Even though I disagree with being penalized for an honest mistake made with no ill intentions, I will grudgingly agree to the terms set by Mr. Walker Boyd.

Thank you,

Stefani Lord

Representative District 22

www.Lord22.com

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Twitter @Lord4NM

From: Boyd, Walker, SEC <Walker.Boyd@sec.nm.gov>
Sent: Monday, October 30, 2023 1:21 PM
To: Stefani Lord <info@lord2020.com>
Subject: RE: [EXTERNAL] Rael V. Lord

Good afternoon Representative Lord:

Thank you for this information. Please see the attached settlement offer. Do not hesitate to contact me with any questions or concerns.

Kind regards,

Walker Boyd

General Counsel

State Ethics Commission

800 Bradbury Drive Southeast, Suite 215

Albuquerque, NM 87106

walker.boyd@sec.nm.gov

mobile: (505) 554-7196

website: <https://sec.nm.gov>

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From: Stefani Lord <info@lord2020.com>
Sent: Monday, October 9, 2023 12:36 PM
To: Boyd, Walker, SEC <Walker.Boyd@sec.nm.gov>
Subject: [EXTERNAL] Rael V. Lord

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Dear MR. Boyd:

I have reviewed and attached all relevant information and documentation I found in the period allowed before my response was due. As stated in the response to the SOS, the alleged violations in the complaints do not reference what statute in the Campaign Reporting Act or the Financial Disclosure Act is being violated, but all information required by statute was correctly entered into the Campaign Finance Information the system as required by the Campaign Reporting Act or the Financial Disclosure Act.

All Transactions incurred and entered are in compliance.

Please see the attached PDF.

If you have questions, please call me. I will be driving down to Carlsbad today for an interim committee meeting tomorrow.

(505)220-1913

Thank you,

Stefani Lord

Representative District 22

www.Lord22.com

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